

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XF AGENCIJA LIMITED AND XF AGENCIJA US
INC.

Plaintiffs,

vs.

INDIVIDUALS, BUSINESS ENTITIES, AND
UNINCORPORATED ASSOCIATIONS ON
SCHEDULE “A”

Defendants.

Case No.

PLAINTIFFS’ MOTION TO EXCEED PAGE LIMIT

Plaintiffs, XF Agencija Limited and XF Agencija US Inc. (collectively, “Plaintiffs” or “Nooro”), by undersigned counsel, respectfully request that they be given leave to file their memorandum of law in support of Plaintiffs’ *Ex Parte* Motion for Entry of a Temporary Restraining Order, Including a Temporary Injunction, a Temporary Asset Restraint, Expedited Discovery, and Service of Process by Electronic Mail in excess of 15 pages (the “TRO Motion”).

In the TRO Motion, Plaintiffs seek: (1) a temporary injunction against Defendants enjoining use of Plaintiffs’ Nooro trademark, enjoining operation of Defendants’ Nooro imposter websites, enjoining marketing and sale of infringing Nooro products, and requiring transfer of Defendants’ infringing domains; (2) a temporary restraint of Defendants’ assets to preserve Plaintiffs’ right to an equitable accounting; (3) expedited discovery allowing Plaintiffs to subpoena third parties for information relating to the manufacture, distribution, offering for sale, and sale of infringing Nooro products and Defendants’ financial accounts; and (4) service by electronic mail upon Defendants’ web hosting companies and website registrars.

Plaintiffs' memorandum of law is approximately 17 pages, which is substantially less than the 60-page limit allowed if four motions were filed separately.

Plaintiffs therefore request that they be granted leave to file a combined memorandum of law in excess of 15 pages for purposes of efficiency.

Date: September 22, 2023

Respectfully submitted,

By: /s/ Brian Roth

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